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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

15 Plaintiff, by and through her attorneys, STOVALL & ASSOCIATES, hereby submits a
16 Stipulated Motion to Extend the Discovery, pursuant to Local Rules 6-1 and 26-4. Defendants Bank
17 of America, N.A., successor by merger with BAC Home Loans Servicing, LP, Countrywide Home
18 Loans, Inc. And Plaintiff, Audrey Hampton (collectively "The Parties"), request the extension of the
19 current discovery cut off date of March 5, 2012.

20 This is a wrongful foreclosure action. This action was filed by Plaintiff on September 10,
21 2010. (Dkt. #1.) After initial motions and answers, on June 16, 2011, the Court entered a discovery
22 plan. (Dkt. #35). The parties have already provided their initial disclosures. The parties have engaged
23 in written discovery, with each party having served answers and supplements. To date, there have
24 not been any depositions taken. The parties have not yet disclosed experts or conducted any expert-
25 related discovery. The Parties filed their first stipulated motion to extend time regarding
26 discovery/nondispositive matter. (Dkt. #40.) On November 28, 2011, an Order was issued granting
27 the joint motion to extend discovery deadlines. (Dkt. #41).

28 Defendants have supplemented their responses to Plaintiff's discovery requests but are still

1 attempting to retrieve additional documents and require approximately one (1) month to do so. In
2 addition, Defendants have recently disclosed the names and contact information of various
3 employees that Plaintiff must depose. Plaintiff requires approximately three (3) months to depose
4 said employees. Furthermore, Defendants are still evaluating Plaintiff's loan modification which,
5 if approved, would facilitate settlement. The discovery deadline is March 5, 2012. This is the second
6 request for extension.

7 Accordingly, the parties request a ninety (90) day extension to the existing discovery and case
8 management deadlines. Under the extension,

- 9 1. Last date to complete discovery: **June 5, 2012**;
- 10 2. Last date to amend pleadings and add parties: **March 5, 2012**;
- 11 3. Last date to file interim status report: **April 5, 2012**;
- 12 4. Last date to disclose experts pursuant to Fed. R.Civ. P. 26(a)(2): **April 5, 2012**;
- 13 5. Last date to disclose rebuttal experts: **May 7, 2012**;
- 14 6. Last date to file dispositive motions: **July 5, 2012**; and
- 15 7. Last date to file joint pretrial order: **August 6, 2012**. In the event dispositive motions
16 are filed, the date for filing the joint pretrial order shall be suspended until thirty (30
17 days after a decision of the dispositive motions.

18 DATED this 2nd day of March, 2012.

19
20 /s/ *J. Christopher Jorgensen*

21 J. CHRISTOPHER JORGENSEN, ESQ.
22 Nevada Bar No. 5382
23 Lewis and Roca LLP
24 3993 Howard Hughes Pkwy, Ste 600
25 Las Vegas, NV 89169
26 (702) 949-8200

/s/ *Ross H. Moynihan*

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1 **CERTIFICATE OF MAILING**

2 I hereby certify that on the March 2, 2012, I caused to be served a true and correct copy of
3 the foregoing **STIPULATED MOTION OF DEFENDANTS AND PLAINTIFF TO EXTEND**
4 **THE DISCOVERY CUT OFF DATE** (Second Request), by mail using the United States Postal
5 Service with first class postage prepaid thereon in a sealed envelope addressed to the following:

6
7 **J. CHRISTOPHER JORGENSEN, ESQ.**
8 Lewis and Roca LLP
9 3993 Howard Hughes Pkwy, Ste 600
10 Las Vegas, NV 89169
11 Attorney for Defendants
12 BAC Home Loans Servicing, LP and
13 Countrywide Home Loans, Inc.

14 */s/ Isolde Parr*

15 An employee of STOVALL & ASSOCIATES

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

AUDREY HAMPTON,) CASE NO.:2:10-cv-01775-RLH-PAL
Plaintiff,)
vs.) **ORDER**
COUNTRYWIDE HOME LOANS, INC.; BAC)
HOME LOANS SERVICING, LP, a subsidiary of)
BANK OF AMERICA; FEDERAL LOAN)
MORTGAGE COMPANY;)
Defendants.)

This matter is before the Court with the Stipulated Motion of Defendants and Plaintiff to Extend Discovery and Case Management Deadlines (#41), filed March 2, 2012. Upon review and consideration,

IT IS ORDERED that the Stipulated Motion of Defendants and Plaintiff to Extend the Discovery and Case Management Deadlines (#41) is **granted**. The following discovery plan and scheduling order dates shall apply:

1. Last date to complete discovery: **June 5, 2012**;
 2. Last date to amend pleadings and add parties: **March 5, 2012**;
 3. Last date to file interim status report: **April 5, 2012**;
 4. Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2): **April 5, 2012**;
 5. Last date to disclose rebuttal experts: **May 7, 2012**;
 6. Last date to file dispositive motions: **July 5, 2012**; and
 7. Last date to file joint pretrial order: **August 6, 2012**. In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30)

1 days after a decision of the dispositive motions.

2 **IT IS FURTHER ORDERED** the disclosures required by Fed. R. Civ. P. 26(a)(3), and any
3 objections thereto, shall be included in the pretrial order.

4 **DATED** this 6th day of March, 2012.

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GEORGE FOLEY, JR.

8 United States Magistrate Judge
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